

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAIMARIA BODOR,
individually and on behalf of all others
similarly situated,

Plaintiff,

vs.

MAXIMUS FEDERAL SERVICES, INC.,
Defendant.

CIVIL ACTION

NO. 5:19-cv-05787 (JMG)

**PLAINTIFF’S MOTION FOR APPROVAL OF
PROPOSED CLASS ACTION SETTLEMENT (UNOPPOSED)**

Plaintiff Jaimaria Bodor filed this consumer class action alleging, on behalf of herself and others similarly situated, that Maximus Federal Services, Inc. (“Maximus”) violated the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq.* by causing these borrowers’ tax refunds to be withheld in violation of their federal rights, and by misrepresenting the status of borrowers’ debts to the U.S. Department of Treasury. After more than three years of litigation during which the parties reviewed thousands of pages of discovery and completed pretrial dispositive motion practice, the parties reached a class-wide settlement. The written settlement agreement (“Agreement”) is attached as Exhibit 1.

The proposed Agreement provides that each of the 274 borrowers in the Class will be sent a check for \$165—an amount intended to compensate the Class Members for their temporary loss of funds. Ex. 1, Agreement § III.F.1. The checks will be sent by a professional settlement administrator hired at Maximus’s expense. *Id.* § III.D. As is common in this Court, the proposed Agreement provides for a service award to Ms. Bodor of \$10,000. *Id.* § III.I. As the FDCPA is a fee-shifting statute, the proposed Agreement also provides for payment of \$190,000 in combined attorney fees and costs. *Id.* § III.H.

Plaintiff accordingly brings this Motion to preliminarily approve the proposed Agreement to settle on a class-wide basis and to notify the Class of the proposal, along with their right to object and opt out, pursuant to Federal Rule of Civil Procedure 23(e)(1)–(2). In support, Plaintiff incorporates by reference her Memorandum of Law, exhibits, and counsel Declarations filed herewith. A proposed form of order is attached as Exhibit B to the Settlement Agreement.

DATED: July 21, 2023

Respectfully submitted,

/s/ Stuart T. Rossman (BBO #430640)

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Counsel for Plaintiff and the Class

CERTIFICATE OF SERVICE

I, Jody T. Lopez-Jacobs, do hereby certify that a copy of the foregoing was served upon all counsel of record by CM/ECF electronic filing.

Date: 7/21/2023

/s/ Jody T. López-Jacobs
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